

Exhibit 11

From: [Powell, Amy \(CIV\)](#)
To: [Konkoly, Antonia \(CIV\)](#); [Gadeir Abbas](#); [Lena F. Masri, Esq.](#); [Ahmed Mohamed](#); [Jack Cooper](#); shereef@akeelvalentine.com
Cc: [Roth, Dena M. \(CIV\)](#)
Subject: RE: December 29 meet and confer
Date: Wednesday, January 03, 2018 8:48:45 AM

Gadeir –

Thanks for reaching out to us on Friday. I wanted to update you that we are in discussions with clients about whether we can offer revised responses to any of the RFAs identified in our summary email below. I do not see us coming to an agreement on watchlist status, but several of the other RFAs may offer an opportunity for an agreed upon revision. As you might imagine, it was difficult to consult all the necessary stakeholders over the holiday, but we hope to get back to you soon. I was hoping you could hold off on filing the motion to compel on those points until we have had a chance to discuss further.

Thanks,

Amy

Amy Elizabeth Powell
Trial Attorney, Federal Programs Branch
Civil Division, Department of Justice
310 New Bern Avenue, Suite 800
Federal Building
Raleigh, NC 27601-1461
Phone: 919-856-4013
Email: amy.powell@usdoj.gov

From: Konkoly, Antonia (CIV)

Sent: Friday, December 29, 2017 2:18 PM

To: Gadeir Abbas ; Lena F. Masri, Esq. ; Ahmed Mohamed ; Jack Cooper ; shereef@akeelvalentine.com

Cc: Powell, Amy (CIV) ; Roth, Dena M. (CIV)

Subject: December 29 meet and confer

Gadeir,

Thanks for chatting this morning. To briefly summarize and commemorate our call:

- You sought clarification on TSC RFAS Nos. 5-7, 12-18, 20-22, 24, 26-55 and DHS TRIP RFAS Nos. 25-64. We will confer with the agencies and get back to you as soon as possible with a response. We understand that you intend to move to compel with respect to those discovery requests as soon as next Tuesday. The parties agreed that a somewhat elongated briefing schedule would be appropriate for that motion (if one is filed), due to both the New Year holiday and the need for defendants to, at minimum, prepare declarations in order to assert appropriate privileges. We'll confer with our clients on that aspect and get back to you.
- You agreed to check Ali's availability for deposition on either January 5 or 9. We further agreed that the proposed deposition of Halabi on the 19th should be rescheduled.
- We will confer further, but at the moment defendants are not available for deposition on the 11th or 12th. It's possible something might free up; we should have a better sense of that next week and will let you know if we can make ourselves available for one or both of those dates.

- You also inquired as to our willingness to join a motion to extend all discovery deadlines. We've conferred internally on that, and take the tentative position that such a motion would be premature and unwarranted (and certainly likely to be viewed as such by the court) at this time. We are open to revisiting this issue later, based on further developments.
- Finally, you agreed to provide a copy of Fares's passport and a verification from Shaout in advance of their depositions next week. We would appreciate receipt of those as soon as possible.

Thanks,
Toni
Antonia Konkoly
Trial Attorney
U.S. Department of Justice
Civil Division | Federal Programs Branch
Direct line: (202) 514-2395
email: Antonia.Konkoly@usdoj.gov